UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
TUFENKIAN IMPORT/EXPORT VENTURES, INC.	
Plaintiff,	08 CIV 4953(SAS)
-against-	
TRUETT FINE CARPETS & RUGS AND DAVID TRUETT,	
Defendants.	

DECLARATION OF ANTHONY XANTHAKIS IN SUPPORT OF MOTION TO DISMISS

Anthony Xanthakis hereby declares the following under penalty of perjury:

- I am a member of Galvano & Xanthakis, PC, attorneys for the defendants and as such I am fully familiar with the facts and circumstances of this case.
- I submit this declaration in support of defendants' motion to dismiss the summons and complaint for failure of this court to acquire personal jurisdiction over the defendants.
- Attached to this declaration as Exhibit A, are three invoices evidencing sale of the three rugs to the Hilton Dallas Lincoln Center Hotel dated 4/19/2004.
- Attached to this declaration as Exhibit B is the letter from plaintiff to defendant, dated April 25, 2006 terminating their relationship.

Dated:New York, NY July 21, 2008

Anthony Xanthakis, Esq. (2254)

Exhibit A To Xanthakis Declaration

Truett Fine Carpets and Rugs

A Division of David Truett Enterprises 1444 Oak Lawn Avenue Suite 220 Dallas, TX 75207

Invoice

Date	Invoice #
4/19/2004	2517

Bill To	Ship To	
HILTON SUPPLY MANAGEMENT ATTN: EDWINA BURTT 9336 CIVIC CENTER DRIVE BEVERLY HILLS, CA 90210	DALI.AS, TX	

			P.O. No.	Terms	Project
			16448	50% DEPOSIT	2517
Qty	Item	Descri	iption	Rate	Amount
	HAND TUFTED	HAND TUFTED RUG- CUS LOBBY (C100) APPROX. SIZE 21'9" X 46'	TOM AREA RUG @	26,768.00	26,768.00
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HAND TOFTED	LOBBY (C100) APPROX. SIZE 21'9" X 46'	26,768.00	20,700.00
SLAB PAD	SLAB PAD FOR AREA RUG @ LOBBY (CP-100)	751.00	751.00
PREPAYMENT	CUSTOMER DEPOSIT APPLIED TO INVOICE	-13,384.00	-13,384.00
	RUG EXPECTED TO ARRIVE IN DALLAS FIRST WEEK OF APRIL		
	TERMS: 50% DEPOSIT, BALANCE NET 30		

Subtotal	\$14,135.00
Sales Tax (0.00)	\$0.00
Total	\$14,135.00
Payments/Credits	\$ -14,135.00
Balance Due	\$0.00

Truett Fine Carpets and Rugs

A Division of David Truett Enterprises 1444 Oak Lawn Avenue Suite 220 Dallas, TX 75207

Invoice

Date	Invoice #
4/19/2004	2546

Bill To	Ship To
HILTON SUPPLY MANAGEMENT ATTN: A/P EDWINA BURTT 9336 CIVIC CENTER DRIVE BEVERLY HILLS, CA 90210	DALLAS, TX

P.O. No.	Terms	Project	
16448	50% DEPOSIT	2546	

Qty	Item	Description	Rate	Amount
	HAND TUFTED	HAND TUFTED RUG- CUSTOM AREA RUG @ ENTRY (C102) SIZE- 14' X 31'	12,152.00	12,152.00
	SLAB PAD	SLAB PAD FOR AREA RUG@ ENTRY (C102)	372.50	372.50
	PREPAYMENT	CUSTOMER DEPOSIT APPLIED TO INVOICE	-6,076.00	-6,076.00
		RUG EXPECTED IN DALLAS FIRST WEEK OF APRIL		
		TERMS: 50% DEPOSIT, BALANCE NET 30		

	Subtotal	\$6,448.50
	Sales Tax (0.00)	\$0.00
	Total	\$6,448.50
Γ	Payments/Credits	\$-6,448.50
	Balance Due	\$0.00

Truett Fine Carpets and Rugs

A Division of David Truett Enterprises 1444 Oak Lawn Avenue Suite 220 Dallas, TX 75207

Invoice

Date	Invoice #
4/19/2004	2545

	The second	
13	Ship To	
	DALLAS, TX	

P.O. No.	Terms	Project
16448	50% DEPOSIT	2545

Item	Description	Rate	Amount
HAND TUFTED	HAND TUFTED RUG- CUSTOM AREA RUG @ LOBBY (C101) APPROX. SIZE 24' X 60'6"	37,744.00	37,744.00
SLAB PAD	SLAB PAD FOR AREA RUG @ LOBBY (CP101)	1,372.50	1,372.50
PREPAYMENT	CUSTOMER DEPOSIT APPLIED TO INVOICE	-18,872.00	-18,872.00
	RUG EXPECTED IN DALLAS FIRST WEEK IN APRIL		
	TERMS: 50% DEPOSIT, BALANCE NET 30		
	SLAB PAD	SLAB PAD SLAB PAD FOR AREA RUG @ LOBBY (CP101) PREPAYMENT CUSTOMER DEPOSIT APPLIED TO INVOICE RUG EXPECTED IN DALLAS FIRST WEEK IN APRIL	LOBBY (C101) APPROX. SIZE 24' X 60'6" SLAB PAD SLAB PAD FOR AREA RUG @ LOBBY (CP101) 1,372.50 PREPAYMENT CUSTOMER DEPOSIT APPLIED TO INVOICE RUG EXPECTED IN DALLAS FIRST WEEK IN APRIL TERMS: 50% DEPOSIT, BALANCE NET 30

Subtotal	\$20,244.50
Sales Tax (0.00)	\$0.00
Total	\$20,244.50
Payments/Credits	\$-20,244 .50
Balance Due	\$0.00

Exhibit B To Xanthakis Declaration

TUFENKIAN ARTISAN CARPETS

April 25, 2006

Mr. David Truett Truett Fine Carpets & Rugs 1444 Oak Lawn Avenue, Suite 220 Dallas, TX 75207

Dear David;

I am writing to advise you that Tufenkian has made the unilateral decision to terminate the relationship with your Company. We came to this decision for three primary reasons.

- The limited amount of Tufenkian sales volume you have been able to generate in the Dallas market.
- Tufenkian's desire to have a showroom in Dallas. As you well know we approached you a number of times to partner with us on a Tufenkian Showroom
- The consistent struggle with your account over numerous credit issues to the point we feel it is detrimental to our growth with your account and the Market in general.

Please advise us of any projects your sales personnel have been developing. The projects should be registered and the list sent to me by May 19th. The rugs must be ordered by July 31st. All orders placed from May 1st through July 31st will be purchased on a cash before delivery basis. As of July 31, 2006 Tufenkian Carpets will supply only custom or back-ordered rugs that have been paid in full.

Sales Support will issue return authorizations for any rugs consigned to you or any rugs falling within the non-expired exchange period. These need to be returned by July 31st in order for you not to be invoiced. This also applies to the two display racks and double bars you have in your showroom.

THE EMPERON SERVICE SERVICED FLOOR LIEW FORE WAS TOOKS

We appreciate your past business and wish you the best in your future endeavors.

Regards,

V.P. Sales & Marketing

Ron Elliott, Regional Director of Sales Cc:

Deirdre Mangine, Regional Sales Manager

Eric Jacobson, Chief Financial Officer

Richard Fernicola, Director of Operations Marisa Mesropian, Director of Customer Relations

Raven Hicks, Credit Collection Manager